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 15 Chapter 11 Trustee

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF NEVADA**

11 In re:	CASE NO. BK-21-14978-ABL	
12 SILVER STATE BROADCASTING, LLC,	Chapter 11	
13 AFFECTS THIS DEBTOR	<input type="checkbox"/>	<i>Jointly Administered with:</i>
14 AFFECTS GOLDEN STATE	<input type="checkbox"/>	GOLDEN STATE BROADCASTING, LLC
15 BROADCASTING, LLC		Case No. 21-14979-ABL
16 AFFECTS MAJOR MARKET	<input type="checkbox"/>	Major Market Radio, LLC
17 RADIO, LLC		Case No. 21-14980-ABL
18 AFFECTS ALL DEBTORS	<input checked="" type="checkbox"/>	<u>Hearing Date:</u> Date: May 1, 2023 Time: 1:30 p.m. Pacific Time

19 **STIPULATION BETWEEN CHAPTER 11 TRUSTEE AND C&E HAAS**
 20 **DEVELOPMENT COMPANY, LLC TO EXTEND BRIEFING DEADLINES AND**
 21 **CONTINUE HEARING REGARDING TRUSTEE'S EMERGENCY MOTION FOR**
 22 **MODIFICATION OF THE AUTOMATIC STAY OR, IN THE ALTERNATIVE, RELIEF**
 23 **FROM CURRENT STAY MODIFICATION ORDER AND TO REINSTATE THE**
 24 **AUTOMATIC STAY [ECF NO. 446]**

25 Michael Carmel, in his capacity as the Chapter 11 trustee ("Trustee") of the bankruptcy
 26 estates of Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market
 27 Radio, LLC,¹ by and through his counsel of record Gregory E. Garman, Esq., Talitha Gray
 28

1 (Silver State Broadcasting, LLC, Golden State Broadcasting, LLC, and Major Market Radio, LLC collectively, the
 "Debtors".)

1 Kozlowski, Esq., and Mary Langsner, Ph.D. of the law firm Garman Turner Gordon LLP, and
 2 C & E Haas Development Company, LLC (“C&E”), by and through its counsel of record Candace
 3 C. Carlyon, Esq. and Tracy M. O’Steen, Esq. of the law firm Carlyon Cica Chtd., stipulate and
 4 agree as follows:

5 **RECITALS**

6 1. On October 19, 2021 (“Petition Date”), the Debtors filed their voluntary petitions
 7 for relief under Chapter² 11 of the Bankruptcy Code, thereby commencing the above-captioned
 8 bankruptcy cases (the “Chapter 11 Cases”). *See* ECF No. 1.

9 2. On November 19, 2021, this Court entered its *Order Authorizing Joint*
 10 *Administration of Cases* directing that “the Chapter 11 case of SILVER STATE
 11 BROADCASTING, LLC (Case No. 21-14978-abl), shall be jointly administered with the Chapter
 12 11 cases of GOLDEN STATE BROADCASTING, LLC (Case No. 21-14979-abl) and MAJOR
 13 MARKET RADIO LLC (Case No. 21-14980-abl), with SILVER STATE BROADCASTING,
 14 LLC designated as the Lead Case (“Lead Case”), and all papers relating to the above referenced
 15 Debtors shall be docketed in the Lead Case (Case No. 21-14978-abl).” *See* ECF No. 37.

16 3. On March 6, 2023, this Court entered its *Order on United States Trustee’s Motion*
 17 *to Appoint Chapter 11 Trustee Under 11 U.S.C. § 1112(b); and Memorandum of Point and*
 18 *Authorities in Support and Reservation of Rights [ECF No. 405], and Creditor Mincin Law,*
 19 *PLLC’s Motion for Appointment of Chapter 11 Trustee [ECF No. 393]*, thereby directing the
 20 appointment of a Chapter 11 trustee for the Debtors’ estates. *See* ECF No. 419.

21 4. On March 10, 2023, Tracy Hope Davis, the United States Trustee for Region 17,
 22 appointed the Trustee as the Chapter 11 trustee for Debtors’ estates. *See* ECF No. 420.

23 5. On March 10, 2023, the Court entered its *Order Approving Appointment of Chapter*
 24 *11 Trustee [ECF No. 422]*, thereby approving the Trustee’s appointment.

25
 26
 27 2 All references to “Section” herein shall be to the Bankruptcy Code appearing in Title 11 of the U.S. Code; all
 28 references to a “Bankruptcy Rule” shall refer to the Federal Rules of Bankruptcy Procedure; and all references to a
 “Local Rule” shall refer to the Local Rules of Bankruptcy Practice of the U.S. District Court for the District of Nevada.

6. On March 13, 2023, the Trustee filed his *Notice of Acceptance of Appointment of Chapter 11 Trustee* accepting appointment as the Chapter 11 trustee for the Debtors' estates. See ECF No. 424.

7. On March 31, 2023, the Trustee filed his *Emergency Motion for Modification of the Automatic Stay or, in the Alternative, Relief from Current Stay Modification Order and to Reinstate the Automatic Stay* [ECF No. 446] (the “Motion”).

8. The Motion was noticed for a hearing date of May 1, 2023, at 1:30 p.m. prevailing Pacific Time (“Hearing”), with a commensurate opposition deadline set by Local Rule of Bankruptcy Practice of the United States Bankruptcy Court for the District of Nevada of April 17, 2023, with any reply by the Trustee due on April 24, 2023 (together, the “Original Briefing Deadlines”). See ECF No. 449.

9. By stipulation of the Trustee and C&E (together, the “Parties”), the Original Briefing Deadlines were extended as follows: C&E’s opposition deadline continued to the new date of April 21, 2023 (“C&E Opp. Deadline”), and the Trustee’s reply deadline continued to the new date of April 28, 2023 (“Trustee Reply Deadline”; together with the C&E Opp. Deadline, the “Current Briefing Deadlines”). See ECF No. 480 (“Stipulation”). The Stipulation was approved by the Court. See ECF No. 493.

10. The Parties continue to dialogue respecting the Motion and seek additional time to continue their discussions; therefore the Parties respectfully request a continuance of the Current Briefing Deadlines and the Hearing as set forth herein:

- That the Hearing be continued for thirty (30) days, or to a date set by the Court in any order approving of this Stipulation (“Continued Hearing Date”);
 - That the C&E Opp. Deadline be continued from April 21, 2023, to a date fourteen (14) days before the Continued Hearing Date; and
 - That the Trustee’s Reply Deadline be continued from April 28, 2023, to a date seven (7) days before the Continued Hearing Date.

STIPULATION

Based on the foregoing, the Trustee and C&E stipulate and agree to continue the Hearing

1 from May 1, 2023, at 1:30 p.m. for thirty (30) days, or to a date set by the Court in any order
 2 approving of this Stipulation; and to continue the deadline for C&E to file any response in
 3 opposition to the Motion [ECF 446], from April 21, 2023, to a date fourteen (14) days before the
 4 Continued Hearing Date set by this Court; and to continue the deadline for the Trustee to reply in
 5 response to any C&E opposition from April 28, 2023, to a date seven (7) days before the Continued
 6 Hearing Date set by this Court.

7 A proposed Order approving this Stipulation has been lodged contemporaneously
 8 herewith.

9 Dated this 21st day of April, 2023.

10 GARMAN TURNER GORDON LLP

11 By: /s/ Mary Langsner
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 13 TALITHA GRAY KOZLOWSKI, ESQ.
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 14 MARY LANGSNER, Ph.D.
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 16 [Proposed] Attorneys for Michael Carmel,
Chapter 11 Trustee

Dated this 21st day of April, 2023

CARLYON CICA CHTD.

17 By: /s/ Tracy M. O'Steen
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